

AUSA: Courtney N. Williams (x1473)

**AFFIDAVIT**

I, Trent Tully, being duly sworn, declare and state as follows:

**I. PURPOSE OF AFFIDAVIT**

1. This affidavit is made in support of an application for a warrant to search the following three United States Postal Service ("USPS") parcels (further referred to as the "**SUBJECT PARCELS**") in the custody of the United States Postal Inspection Service ("USPIS") in San Bernardino, California, within the Central District of California, as described more fully in Attachment A:

a. A USPS Priority Mail parcel bearing tracking number 9505 5143 1160 5022 1251 99 (**SUBJECT PARCEL 1**).

b. A USPS Priority Mail parcel bearing tracking number 9505 5143 1183 5022 1318 01 (**SUBJECT PARCEL 2**).

c. A USPS Priority Mail parcel bearing tracking number 9505 5148 8227 5022 3469 74 (**SUBJECT PARCEL 3**).

d. A USPS Priority Express Mail parcel bearing tracking number ER 163 798 244 US (**SUBJECT PARCEL 4**).

2. The requested search warrant seeks authorization to seize evidence, fruits, and instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute a controlled substance); 846 (conspiracy to distribute or possess with intent to distribute a controlled substance); and 843(b) (unlawful use of a communication facility, including the mails, to facilitate the distribution of a controlled substance) (the "Subject

Offenses"), as described more fully in Attachment B.

Attachments A and B are incorporated by reference herein.

3. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only, and all dates and times are on or about those indicated.

## **II. TRAINING AND EXPERIENCE**

1. I am a Task Force Officer ("TFO") with the United States Postal Inspection Service, and I have been so employed since January of 2024. I am currently assigned as a TFO to the Contraband Interdiction and Investigations South Team of the Los Angeles Division, which is responsible for investigating drug trafficking violations involving the United States Mail. As such, I am an "investigative or law enforcement officer" of the United States within the meaning of Title 18, United States Code, Section 2510(7); that is, an officer of the United States empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516. Before being assigned as a TFO with the USPIS, I worked patrol as a full-time sworn law enforcement officer with the Riverside County Sheriff's Office ("RSO"). I

have been a sworn law enforcement officer since January 2011. I am a Police Officer within the meaning of Section 830.1 of the California Penal Code.

2. I have received training and have experience investigating violations of state and federal narcotics and money laundering laws, including, but not limited to, Title 21, United States Code, Sections 841, 846, 952, 959, and 963, and Title 18, United States Code, Section 1956(a). I am familiar with various electronic surveillance methods, techniques, and investigations, including state and federal wiretap investigations and the debriefing of informants and witnesses, as well as others who have knowledge of the manufacturing, distribution, transportation, storage, and importation of controlled substances and the laundering of drug proceeds.

3. I have participated in many aspects of drug trafficking investigations, including investigations into the smuggling of illegal drugs, and extortion concerning drug trafficking. I am familiar with narcotics traffickers' methods of operation, including the manufacturing, storage, transportation, and distribution of narcotics, and the collection of money that represents the proceeds of narcotics trafficking. I am familiar with how drug traffickers use counter-surveillance techniques to avoid detection by law enforcement.

### **III. SUMMARY OF PROBABLE CAUSE**

4. On January 23, 2025, at the United States Postal Service Distribution Plant, located in Redlands, California, I

identified the **SUBJECT PARCELS** as meeting some criteria common to packages containing contraband, including they were was excessively taped, contained handwritten labels, lacked business account numbers, and, according to law enforcement databases, contained sender and recipient names that were not associated with their respective listed addresses.

5. Additionally, on January 23, 2025, a trained narcotic detection dog alerted to the **SUBJECT PARCELS** for the presence of drugs or other items, such as the proceeds of drug sales that have been contaminated by drugs.

#### **IV. STATEMENT OF PROBABLE CAUSE**

##### **A. Background on Use of Mails for Drug Trafficking**

6. Based on my training and experience, my conversations with other Postal Inspectors who specialize in drug investigations, my review of law enforcement reports, and my own participation in this investigation, I know the following:

a. Postal Inspectors have been conducting investigations of drug trafficking via USPS Express Mail and Priority Mail since the mid-1980s. In the early 1990s, Postal Inspectors in Los Angeles, California, began conducting organized interdictions of Priority Mail Express and Priority Mail parcels suspected of containing controlled substances and proceeds from the sale of controlled substances. Postal Inspectors also regularly examined and investigated Priority Mail Express and Priority Mail parcels. During the 1990s, Postal Inspectors observed that the trend was for drug

traffickers to send controlled substances and proceeds from the sale of controlled substances, in the form of cash, using boxes.

b. Although Postal Inspectors still see boxes used to send controlled substances and cash, there has been a gradual change over the years toward the current trend of using smaller boxes, flat cardboard envelopes, and Tyvek envelopes, and proceeds from the sale of controlled substances converted to money orders. By using money orders, drug traffickers are able to send large dollar amounts in compact form, using much smaller conveyances, which lend a sense of legitimacy to the parcel's appearance.

c. The San Bernardino County and Riverside County areas (collectively, the "Inland Empire") are a significant source area for controlled substances. Controlled substances are frequently transported from the Inland Empire area via the United States Mail, and the proceeds from the sale of controlled substances are frequently returned to the Inland Empire area via the United States Mail. These proceeds are generally in the form of money orders, bank checks, or similar monetary instruments in an amount over \$1,000. Based on my training and experience, I know that proceeds from the sale of controlled substances often contain the odor of controlled substances because they have been contaminated with or associated with the odor of one or more controlled substance.

d. Drug traffickers often use: Priority Express Mail, the USPS overnight/next day delivery mail product, Priority Mail, the USPS two-to-three-day delivery mail product,

and recently, USPS Ground Advantage Mail, the two-to-five day delivery mail product. Drug traffickers use Priority Express Mail because of its speed, reliability, and the ability to track the parcel's progress to the intended delivery point. Drug traffickers use the Priority Mail or Ground Advantage Mail services because they allow drug traffickers more time for travel between states if they decide to follow a shipment to its destination for distribution. Also, by adding delivery confirmation to a Priority Mail or Ground Advantage parcel, drug traffickers have the ability to track the parcel's progress to the intended delivery point, as if the parcel had been mailed using Priority Express Mail.

7. The following indicia suggest that a parcel may contain drugs or drug distribution proceeds:

- a. The parcel is contained in a Large Flat Rate cardboard box;
- b. The parcel bears a handwritten or typed label, whether USPS Express Mail or Priority Mail;
- c. The handwritten or typed label on the parcel does not contain a business account number;
- d. The seams of the parcel are all taped or glued shut;
- e. The parcel emits an odor of a cleaning agent or adhesive or spray foam that can be detected by a human; and

8. Parcels exhibiting such indicia may be subject to further investigation, which may include verification of the addressee and return addresses.

9. I know from my training and experience that drug traffickers often use fictitious or incomplete names and addresses in an effort to conceal their identities from law enforcement officers investigating these types of cases. To the extent that real addresses are ever used, it is only to lend a legitimate appearance to the parcel and is almost always paired with a false name.

**B. Initial Investigation of the SUBJECT PARCELS**

10. On January 23, 2025, during routine parcel inspections at the United States Postal Service Distribution Plant, I determined that the **SUBJECT PARCELS** met some of the initial suspicious characteristics as described above. Specifically, I determined the following:

a. **SUBJECT PARCEL 1** is a USPS Priority Mail parcel bearing tracking number 9505 5143 1160 5022 1251 99. **SUBJECT PARCEL 1** is a medium sized white USPS parcel box. It has a handwritten label and does not contain a business account number. According to law enforcement records, the return address listed on **SUBJECT PARCEL 1**, "3312 Iowa Ave Riverside CA 92507," appears to be a legitimate address, but is not associated with the listed sender, "The Fandation." The recipient address listed on **SUBJECT PARCEL 1**, "2845 Palumbo dr. Apt 7H Lexington KY 40509," appears to be a legitimate address, but is not associated with the listed recipient, "Kiara P."

b. **SUBJECT PARCEL 2** is a USPS Priority Mail parcel bearing tracking number 9505 5143 1183 5022 1318 01. **SUBJECT PARCEL 2** is a large, brown, heavily taped, cardboard box. It



has a handwritten label and does not contain a business account number. According to law enforcement records, the return address listed on the **SUBJECT PARCEL 2**, "249 W Morgan St rialto CA 92376," appears to be a legitimate address, but is not associated with the listed sender, "luis garcia." The recipient address listed on **SUBJECT PARCEL 2**, "8421 s, Claiborne Ave. Apt #2 New orleans, louisiana 70118," appears to be a legitimate address, but is not associated with the listed recipient, "bryan Garcia."

c. **SUBJECT PARCEL 3** is a USPS Priority Mail parcel bearing tracking number 9505 5148 8227 5022 3469 74. **SUBJECT PARCEL 3** is a large, brown, heavily taped, cardboard box. It has a handwritten label and does not contain a business account number. According to law enforcement records, the return address listed on **SUBJECT PARCEL 3**, "13551 Lasselle St. Moreno Valley CA 92553," appears to be a legitimate address, but is not associated with the listed sender, "Cristina Barrono." The recipient address listed on **SUBJECT PARCEL 3**, "1032 SE Lieu ST Topeka Kansas 66607," appears to be a legitimate address, and is associated with the listed recipient, "Rosario Barrenio."

d. **SUBJECT PARCEL 4** is a USPS Priority Express Mail parcel bearing tracking number ER 163 798 244 US. **SUBJECT PARCEL 4** is a large, brown, heavily taped, cardboard box. It has a handwritten label and does not contain a business account number. According to law enforcement records, the return address listed on **SUBJECT PARCEL 4**, "11264 Day ST #916 Moreno Valley 92553," does not appear to be a legitimate address, but

is not associated with the listed sender, "MICKAEL RobertSON." The recipient address listed on **SUBJECT PARCEL 4**, "216 STeRLing DR HOUMA, LA 70363," appears to be a legitimate address, but is not associated with the listed recipient, "JAWUAN RoberTSON."

**C. Drug-Detection Dog Alerts to the SUBJECT PARCELS**

11. On January 23, 2025, based on the suspicious characteristics of the **SUBJECT PARCELS**, I requested Riverside County Sheriff's Office Deputy Marcus Murray and his trained drug detection dog, "CC," to examine the exterior of the **SUBJECT PARCELS**. Prior to the examination of the **SUBJECT PARCELS**, I placed them in an area with other similar blank parcel boxes inside a large office room with open adjacent doors leading into additional rooms. Deputy Murray did not know the exact location of the **SUBJECT PARCELS** prior to the sniff occurring. I learned from Deputy Murray that "CC" gave a positive alert to the **SUBJECT PARCELS**, indicating the presence of controlled substances or other items, such as the proceeds of controlled substances, which have been recently contaminated with the odor of controlled substances.

12. Attached as Exhibit 1, and incorporated by reference, is a declaration setting forth information provided by Deputy Murray regarding CC's training and experience in detecting controlled substances and the examination of the **SUBJECT PARCELS**.

**V. CONCLUSION**

13. For the reasons above, there is probable cause to believe that the **SUBJECT PARCELS**, as described in Attachment A,

contain evidence, fruits, and instrumentalities of violations of the Subject Offenses, as described in Attachment B.

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on this 29 day of January 2025.

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HONORABLE SHASHI H. KEWALRAMANI  
UNITED STATES MAGISTRATE JUDGE

**ATTACHMENT A**

**PARCELS TO BE SEARCHED**

The following United States Postal Service ("USPS") parcels seized on January 23, 2025, at the USPS Distribution Plant in Redlands, California are currently in the custody of the United States Postal Inspection Service in San Bernardino, California:

a. **SUBJECT PARCEL 1** is a USPS Priority Mail parcel bearing tracking number 9505 5143 1160 5022 1251 99. **SUBJECT PARCEL 1** is a medium sized white USPS parcel box, weighing 3lbs. 10.50oz. **SUBJECT PARCEL 1** is addressed to "Kiara P 2845 Palumbo dr. Apt 7H Lexington KY 40509." The return address listed on **SUBJECT PARCEL 1** is "The Fandation 3312 Iowa Ave Riverside CA 92507." **SUBJECT PARCEL 1** was postmarked on January 22, 2025, in the 92501 zip code.

b. **SUBJECT PARCEL 2** is a USPS Priority Mail parcel bearing tracking number 9505 5143 1183 5022 1318 01. **SUBJECT PARCEL 2** is a large, brown, heavily taped, cardboard box, weighing 20lbs. 8.8oz. **SUBJECT PARCEL 2** is addressed to "bryan Garcia 8421 s, Claiborne Ave. Apt #2 New orleans, louisana 70118." The return address listed on **SUBJECT PARCEL 2** is "luis garcia 249 W Morgan St rialto CA 92376." **SUBJECT PARCEL 2** was postmarked on January 22, 2025, in the 92376 zip code.

c. **SUBJECT PARCEL 3** is a USPS Priority Mail parcel bearing tracking number 9505 5148 8227 5022 3469 74. **SUBJECT PARCEL 3** is a large, brown, heavily taped, cardboard box, weighing 21lbs 0.8oz. **SUBJECT PARCEL 3** is addressed to "Rosario Barrenio 1032 SE Lieu ST Topeka Kansas 66607." The return

address listed on **SUBJECT PARCEL 3** is "Cristina Barrono 13551 Lasselle St. Moreno Valley CA 92553." **SUBJECT PARCEL 3** was postmarked on January 22, 2025, in the 92553 zip code.

d. **SUBJECT PARCEL 4** is a USPS Priority Express Mail parcel bearing tracking number ER 163 798 244 US. **SUBJECT PARCEL 4** is a large, brown, heavily taped, cardboard box, weighing 7lbs 7oz. **SUBJECT PARCEL 4** is addressed to "JAWUAN RobertSON 1216 STerLing DR HOUMA, LA 70363." The return address listed on **SUBJECT PARCEL 4** is "MICKAEL RobertSON 11264 Day ST #916 Moreno Valley 92553." **SUBJECT PARCEL 3** was postmarked on January 22, 2025, in the 92553 zip code.

**ATTACHMENT B**

ITEMS TO BE SEIZED

The items to be seized are evidence, contraband, fruits, and instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute a controlled substance); 846 (conspiracy to distribute or possess with intent to distribute a controlled substance); and 843(b) (unlawful use of a communication facility, including the mails, to facilitate the distribution of a controlled substance) (the "Subject Offenses"), namely:

- a. Any controlled substances, including marijuana;
- b. Currency, money orders, bank checks, or similar monetary instruments in aggregate quantities over \$1,000; and
- c. Parcel wrappings and packaging material used to conceal items described in (a) and/or (b);
- d. Records reflecting indicia of ownership of the items described in (a) and/or (b);
- e. Records, receipts, pay-owe sheets, or similar documents relating to drug-trafficking.

# Exhibit 1

### **DECLARATION**

I, Deputy Marcus Murray, being duly sworn, declare and state:

I am a sworn peace officer within the meaning of California Penal Code § 830.1.

### **TRAINING AND EXPERIENCE**

I have been a Riverside County Sheriff's Department peace officer for 8 years. I was assigned a canine handler position and have served in the San Jacinto Special Enforcement team since September 2022. At the beginning of my career with the Riverside County Sheriff's Department, I attended a six-month police academy. After completing the academy, I was assigned to the Smith Correctional Facility. In 2020, I was assigned to the patrol division, where I conducted directed patrol and responded to emergency calls for service for 2 years. During this time, I conducted numerous investigations involving subjects who possessed, used, sold, and transported illegal drugs. I observed, arrested, and talked to thousands of subjects while handling or assisting with these investigations.

As part of my duties at the San Jacinto Special Enforcement team, I frequently investigate crimes related to illicit drug sales, transportation, trafficking, manufacturing, and other associated drug violations. Additionally, I have attended schools and courses on narcotic investigation, trafficking techniques, drug trafficking organizations, and a course in Street Crimes and Drug Abuse Recognition. During these trainings, I received instruction and hands-on experience with how illicit drugs are manufactured, packaged, transported, sold, and ingested. On multiple occasions I have purchased illegal drugs in an undercover capacity and routinely worked with confidential informants during the course of my duties. I frequently interview subjects involved in the drug trade to stay informed on current street trends.

### **NARCOTICS K9 TEAM DEPUTY MURRAY AND K9 C.C.'S TRAINING AND CERTIFICATIONS**

In March of 2023 I attended a three-week K9 handler's course taught by Vohne Liche Kennels (VLK). in Banning, California. At the conclusion of the course K9 "C.C." (a one-and-a-half-year-old Belgian Malinois) and I were certified as a drug detection K9 team through VLK



and the Peace Officer Standards and Training (“P.O.S.T.”). K9 C.C. is trained to detect odors of the following controlled substances: methamphetamine, cocaine, heroin, and fentanyl.

Certifications typically are conducted bi-annually and K9 C.C.’s most recent certification took place on March 23, 2023. In addition to bi-annual certifications, K9 C.C.’s reliability and proficiency are tested bi-weekly by VLK in a controlled environment. All certifications and most proficiency assessments are conducted “single-blind” (where the result is unknown to the handler). Single-blind certification and proficiency assessments ensure the handler cannot “cue” the dog, as the handler does not know the result. All of K9 C.C.’s certifications and training are conducted using absolute contraband that has been tested and confirmed as such. K9 C.C. and I train approximately 16 hours a month in the area of narcotics detection and frequently use circulated and uncirculated United States Currency as a distraction odor.

On Thursday, January 23, 2025, Task Force Officer (“TFO”) Trent Tully advised me that he seized several parcels from the United States Postal Plant located in Redlands, CA. TFO Tully transported the parcels to the San Bernardino Post Office and requested my K9 narcotics detection partner C.C.’s assistance in a narcotics parcel investigation. TFO Tully asked me to meet at the United States Post Office at 390 West 5th Street in San Bernardino, CA 92401. I responded the same day at approximately 1530 hours. K9 C.C. conducted a sniff of the parcels described below. Before the search, TFO Tully placed the parcels and additional blank parcels in an open area containing several adjacent rooms. TFO Tully also made the search blind for C.C. and me by placing the parcels in areas that were unknown to me.

C.C. gave a positive alert for the presence of an odor he is trained to detect (methamphetamine, heroin, cocaine, and fentanyl). K9 C.C. alerted to the odor of narcotics emitting from the parcel listed below:

#1 United States Postal Service Priority Mail bearing tracking label number:

9505 5143 1160 5022 1251 99

#2 United States Postal Service Priority Mail bearing tracking label number:

9505 5143 1183 5022 1318 01

#3 United States Postal Service Priority Mail bearing tracking label number:

9505 5148 8227 5022 3469 74

#4 United States Postal Service Priority Express Mail bearing tracking label number:

ER 163 798 244 US

*Deputy Marcus Murray*

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Deputy Marcus Murray

Riverside County Sheriff's Department